

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

v.

JACK STEPHEN PURSLEY,

*Defendant*

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Cause no. 4:18-cr-575

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**DEFENDANT PURSLEY’S PROPOSED VOIR DIRE TOPICS**

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Defendant Jack Stephen Pursley respectfully presents the following topics for consideration by the Court in conducting voir dire. Pursley proposes that questions on such topics be asked with regard to both the prospective jurors and their immediate family members:

1. Unfavorable interactions with lawyers
2. Experience hiring lawyers and/or accountants to assist with business matters
3. Experience relying on professionals to advise about something you know little about
4. Feelings about hiring a professional to find ways to reduce taxes
5. Feelings toward entrepreneurs who start many businesses
6. Experience with business partnership disputes
7. Attitudes about people who have been charged with a crime
8. Experience working overseas
9. Experience working for a (worker) placement agency or “temp agency”
10. Experience working for the government or law enforcement

Respectfully submitted,

/s/ Nicole T. LeBoeuf

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**CERTIFICATE OF SERVICE**

I certify that on August 29, 2019, a copy of this document was served on all counsel of record through filing on the ECF System.

/s/ Nicole T. LeBoeuf

Nicole T. LeBoeuf